

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOHN CORSAUT,

Plaintiff,

**ANSWER**

-against-

TRANSWORLD SYSTEMS INC.,

07 CV 3868  
(DAB)

Defendant.  
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The defendant, **TRANSWORLD SYSTEMS INC.**, by its attorneys, The Law Offices of Edward Garfinkel, as and for an answer to the complaint of the plaintiff herein, respectfully alleges upon information and belief:

**INTRODUCTION**

**FIRST:** Denies paragraph "1" of the complaint and respectfully refers all questions of law to the court.

**JURISDICTION & VENUE**

**SECOND:** Admits paragraphs "6" and "9" of the complaint.

**THIRD:** Denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "4" of the complaint.

**FOURTH:** Denies knowledge or information sufficient to form a belief as to the allegations contained in paragraphs "2", "3" and "5" of the complaint and respectfully refers all questions of law to the court.

**FIFTH:** Denies paragraphs "7" and "8" of the complaint and respectfully refers all questions of law to the court.

**CLASS ACTION ALLEGATIONS**

**SIXTH:** Denies knowledge or information sufficient to form a belief as to the allegations contained in paragraphs "10", "11", "12", "13", "14", "15", "16", "17" and "18" of the complaint and respectfully refers all questions of law to the court.

**AS AND A CAUSE OF ACTION**

**SEVENTH:** Repeats the admissions and denials to the paragraphs of the complaint repeated and re-alleged in paragraph "19" of the complaint.

**EIGHTH:** Admits paragraph "20" of the complaint.

**NINTH:** Denies paragraph "24" of the complaint.

**TENTH:** Denies paragraphs "21", "22" and "23" of the complaint and respectfully refers all questions of law to the court.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

Any alleged violations of the Fair Debt Collection Practices Act were not intentional, but resulted from a bona fide error notwithstanding the maintenance of procedures reasonably implemented to prevent such errors.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

The class action form of litigation is inappropriate and not the superior means of litigating the alleged claims.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

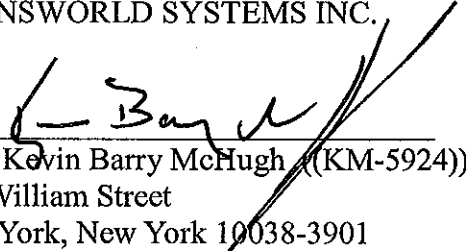
Plaintiff fails to state facts sufficient to state a cause of action.

WHEREFORE, the defendant, **TRANSWORLD SYSTEMS INC.**, demands judgment dismissing the Complaint and further demands judgment over and against the plaintiff, for the amount of any judgment obtained against this defendant, **TRANSWORLD SYSTEMS INC.**, by

the plaintiff or on the basis of apportionment of responsibility in such amounts as a jury or Court may direct together with costs, disbursements, and expenses of this action including attorneys' fees.

Dated: New York, New York  
October 23, 2007

Yours etc.,  
THE LAW OFFICES OF EDWARD GARFINKEL  
Attorneys for Defendant,  
TRANSWORLD SYSTEMS INC.

By:   
Kevin Barry McHugh ((KM-5924))  
110 William Street  
New York, New York 10038-3901  
(212) 809-8000  
Our File # NYNY 26844

TO:

Lawrence Katz (LK-0062)  
Attorney for Plaintiff  
445 Central Avenue, Suite 206  
Cedarhurst, New York 11516  
516.374.2118

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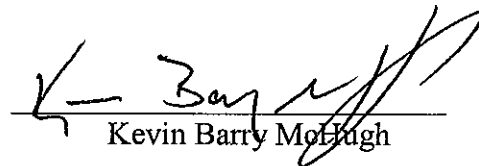
-against-

TRANSWORLD SYSTEMS INC.,

Defendant.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2007 the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules On Electronic Service upon the following parties and participants.

  
Kevin Barry Molloy

TO:

Lawrence Katz (LK-0062)  
Attorney for Plaintiff  
445 Central Avenue, Suite 206  
Cedarhurst, New York 11516  
516.374.2118